

**Subject:** Conley v. County of Erie

**From:** "Timothy D. McNair" <tmcnair@velocity.net>

**Date:** Wed, 16 Nov 2005 08:59:27 -0500

**To:** "Joyal Jr,Edmond R" <EJOYAL@stpaultravelers.com>

**CC:** Anthony Angelone <aangelone@vendettillaw.com>, Mark Lane <mrl@dellmoser.com>

**BCC:** Abby Conley <abby@christian.net>

Mr. Joyal:

We have not yet received responses to our discovery requests. We cannot just let the matter sit for no reason. We discussed this matter last week and you told me that the responses were forthcoming, but would not commit to a date for their production.

If we do not resolve this matter this week, I will have no recourse but to file a Motion to Compel.

If you have a way to resolve this, give me a call. Otherwise, please confirm in writing or by email when we may expect to receive the responses.

Thank you.

Timothy D. McNair

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Timothy D. McNair

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"Nobody has a more sacred obligation to obey the law than those who make the law."

-- Sophocles